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Electric Corporation

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July 16, 1979

Mr. J. P. Recchi, Asst. Supt.
Seattle City Light
1015 3rd Avenue
Seattle, WA 98104

Subject: PCB Regulations - Small Power Transformers
Your Purchase Order No. 7475-1-05 (W) G. O. No. 50220
Commercial Subway Transformers

Dear Mr. Recchi:

In November of 1976 a letter was sent to our customers informing them of the possibility that oil-filled transformers contained varying concentrations of PCBs. The purpose of that letter was to advise that some states were developing regulations controlling PCBs even though there were no national standards set for allowable levels of PCBs in oil for closed electrical systems. We understand that at least one other manufacturer issued a similar notice.

The U.S. EPA, on May 31, 1979, published in the Federal Register, Volume 44, No. 106, the final rule on Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions (40 CFR Part 761). This rule, which incorporates and modifies the previous "disposal and marking rule", regulates your use and disposal of transformers.

There are numerous significant changes from the previously published "disposal and marking" rule and the proposed "ban" rule. Among these changes are: (1) the PCB definition was lowered to 50 ppm from 500 ppm; and (2) three new classes of mineral oil transformers were created — "PCB transformers" = 500 ppm or more, "PCB contaminated transformers" = 50-499 ppm, and "non-PCB transformers" = less than 50 ppm.

The South Boston Small Power Transformer Division has periodically tested its oil filling system for PCBs since July 1976. During the period of time from August 19, 1976 to September 16, 1976 some tests indicated PCB concentrations up to 585 ppm. However, specific units which may exceed 500 ppm cannot be identified from these test results. In order to aid you in complying with the new regulations, we are advising you that the following units were filled with oil during this time period.

Your Order No.

(W) G.O. No.

(W) Serial No.

7475-1-05 4/21/76

SE-50220

YAV-6584-02, YAV-6584-02,

YAV-6584-03, YAV-6584-04,

YAV-6579-04, YAV-6579-05,

YAV-6579-06, YAV-6579-07,

YAV-6579-08, YAV-6579-09

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To the best of our knowledge these units met all existing laws and regulations in effect or even proposed at time of shipment and may or may not fall within the present EPA definition for "PCB transformers". Furthermore, there is no operating problem due to this level of PCBs in oil. Electrical performance and characteristics remain unchanged.

You should consult the regulations as published in the Federal Register of May 31, 1979 to determine the applicable options or actions available.

If this transformer has been re-sold, please advise the new owner of this information.

For your additional information, the South Boston Small Power Transformer Division has continued to monitor its oil system, and PCB levels have remained consistently well below the 50 ppm level now designated for "non-PCB transformers".

In the preamble to the final regulations, the EPA states, "available information indicates that virtually no mineral oil (non askeral) dielectric fluid will be contaminated with PCBs above 500 ppm." This appears to differ from testimony various members of the industry offered at the hearings on the proposed rule. Since non-compliance with these regulations is a serious matter, we believe you should be made aware of this situation. Furthermore, under the final regulations you have the option of taking action which could re-classify a transformer from a PCB transformer to a PCB contaminated or a non-PCB unit, thereby reducing the impact of the regulations while accomplishing the EPA's stated purpose of removing even small amounts of PCBs from the environment.

If you have any questions concerning this matter, please contact me.

Yours truly,


A. W. Kessler
Sales Engineer

AWK:jj

CC: E. R. Jones, Purchasing Dept.
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